

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

NOTICE OF MOTION
AND MOTION FOR AN
ADJOURNMENT
21-CR-31

JOSEPH BELLA,

DEFENDANT

PLEASE TAKE NOTICE, that the undersigned THOMAS J. EOANNOU, ESQ., attorney for the defendant Joseph Bella based upon that following affirmation hereby moves the Court for a (60) day adjournment of the Oral Argument and for such further relief as the Court may deem just, equitable and proper.

AFFIRMATION

1. I am an attorney at law duly licensed to practice in the State of New York and in the Western District of New York with offices located at 484 Delaware Avenue, Buffalo, New York 14202. I represent the defendant, Joseph Bella, who is a defendant in the above-referenced action.

2. I am respectfully requesting an adjournment as to the Oral Argument scheduled for June 18, 2021 at 10:30 a.m.

3. Due to deponent's heavy court calendar I have been unable to visit Mr. Bella at the jail. Deponent seeks additional time to do so in order to prepare for said argument.

4. I have contacted Assistant United States Attorney Nicholas Cooper and he does not consent to this request.

5. All parties agree that the period covered by this adjournment is properly excludable for speedy trial purposes and the interests of justice, as well as the defendant, and the public in a speedy trial, are best served by the exclusion of this time.

WHEREFORE, it is respectfully requested that the Court grant an adjournment of the Oral Argument.

/s/ Thomas J. Eoannou, Esq.

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JOSEPH BELLA,

DEFENDANT

CERTIFICATE OF SERVICE
21-CR-31

I hereby certify that on June 15, 2021, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following EM/ECF Participant on this case:

Nicholas Cooper, AUSA
138 Delaware Avenue
Buffalo, New York 14202

s/Angela Foster

ANGELA FOSTER